2Blue Mountains Biodiversity Project Scoping comments for the Pomeroy Maintenance Non-Commercial Thinning and Prescribed Fire – Phase 1 project

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Although we are generally more accepting on non-commercial thinning of small trees only up to 9" dbh, we do have some concerns about this project—particularly regarding the landscape scale and the intent to "resemble historic stocking levels" and to automatically assume that Ponderosa pine, Western larch, and Douglas fir (timber industry preferred tree species) should be the "preferred" species to be retained at the expense of other native tree species in this project area. Not all areas of the Blue Mountains forests were historically open, dry Ponderosa pine-dominant or co-dominant with Western larch and/or Douglas fir. We're concerned by planning to change ecologically natural tree species composition that may have been moister mixed conifer with historic Grand fire and Englemann spruce to just those three so-called "early seral" species—in the name of "forest health" and for theoretical "fuels reduction"/fire "risk" reduction. Looking at the maps provided, the project area appears to be high elevation, up to over 5,000 feet elevation, with snow-based recreation sites, & a lookout cabin. It also appears to be a moist area with many stream drainages throughout the area.

This leads me to think that Grand fir and Englemann spruce are likely natural and historically present tree species in the overall forest composition. The Forest Service has been trying to eradicate Grand fir since at least 1910, when the agency was more honest about it, calling Grand fir a weedy species and saying it should be eradicated to give rise to Ponderosa pine plantations and give preference to the three timber industry preferred tree species. We support biodiversity and carbon sequestration over endlessly manipulating the forest. We are particularly opposed to the creation and perpetuation of even-age homogenous plantations, which are virtually biologically sterile compared to never logged forests or more variable density forest with a range of tree species and tree sizes. We are very skeptical, based on 30 years of field surveying timber sales in the Blue Mountains, of "fuels reduction" and "forest health" as justifications for management – especially for commercial size logging. We don't want the Forest Service to create and maintain open, relatively sterile even age Ponderosa pine/Western larch/Douglas fir plantations across the landscape. The Forest Service uses "forest health" to refer to and increase individual tree growth and vigor, rather than ecological balance with natural disturbances (including wildfire) as part of that balance. We are opposed to managing the National Forests as tree farms, which does not respect multiple uses of the Forests for wildlife habitat, recreational uses, indigenous people's cultural uses, and plant biodiversity. Making management mistakes at a landscape scale is devastating ecologically.

It's very doubtful that the Forest Service is replicating the kind of fire management that indigenous people used historically, as the scale is now likely larger and the management is not for the same goals.

Regarding the “salvage” post-fire logging and replanting after the School Fire and the Columbia Complex Fire, the best thing to do after fire is to leave the forest alone, based on the best available current science—there’s a very strong scientific consensus on this. Post-fire forests are now thought to be as ecologically diverse or to have more biodiversity than old growth forest. Post fire forests, if not logged and replanted create ecological habitat niches for the many species (native) that evolved with wildfire—including stand replacement fire. Whereas plantations are created by post fire logging and re-planting, creating less resilient homogeneous stands more subject to insect epidemics.

At higher elevations and in areas with moister plant associations, ash soils, in moist or wet drainages, and/or in North or Northeast facing slopes, there should be Grand fir and possible Englemann spruce. Grand fir is critical for Pileated woodpecker and Black bear foraging. Great Gray owl nesting (in old growth flat broken top snags), and for larger tree denning species such as Pacific fisher. Grand fir are also good at retaining moisture internally and in cavities in the base, as well as being preferred marten sites for burrows. Englemann spruce may be threatened by climate change and needs to be protected wherever it exists. Englemann spruce forms long lasting hard snags and logs particularly important for riparian restoration large wood for pool formation.

It seems very unlikely, based on my field experience with Forest Service management, that the Forest Service will actually return to these areas on a 5-10 year rotation, but it is very likely they will return to commercially log an on unsustainable short rotations.

Some questions: What are the elevations, slope aspects, proximity to stream drainages, plan associations and field evidence of forest type historically (e.g. live old growth trees, old growth snag and log species, species in old growth log decks and logging records for these planned NCTing areas? How widely spaced would the small trees be thinned? What “brush” shrubs would be reduced? Are these “brush” species typical of dry forest or moist or wet mixed conifer? How would “historic” stocking levels be determined for young small trees? What is the fire hazard being addressed? This area is not near any wildland/urban interface apparently. Why are back country areas being targeted for fire risk reduction? Is the Forest Service staying completely out of the RHCA buffers for NCTing?

Re: prescribed burning, this was originally intended to replicate the effects of low intensity frequent fire in dry, Ponderosa pine dominant forests, and should be restricted to that forest type.

This is intended as an introduction for you as to our way of perceiving the ecological situation, based on the science. Our priorities are to preserve biodiversity; ecological natural processes; never logged forests; mature, large, and old tree structure; and carbon sequestration to slow or reduce climate change. For the Wild,

Karen Coulter